

8/1104
Date: January 8, 1979

Subject: Minutes of Meeting on the Disposal of PCBs
Materials and Contaminated Materials

In Attendance: Joe Recchi, Pete Henault, Fred Mandapat and Del Young
of City Light and Len Metzger of City Purchasing

Joe Recchi opened the meeting with a historical review and background on the subject followed by later events which have occurred since the opening of the hauling contract bids at 2:00 p.m., Wednesday, December 27, 1978.

Joe also related his telephone conversation with Gene Rinebold of Wes-Con, Inc., Twin Falls, Idaho. Mr. Rinebold called to clarify that his disposal firm was in no way connected with any of the bidders. (Cleander Electric Contractors had stated verbally that they were agents of Wes-Con prior to the request for bids.) Mr. Rinebold stated to Joe that the complex insurance problem associated with the transport of hazardous material in interstate commerce could, in his opinion, best be handled by employing certified I.C.C. carriers to haul from Seattle to Murphy, Idaho. The insurance protection required was already carried by I.C.C. trucking firms.

Joe stated that he felt we have two problems. 1) We have a load of approximately 10,000 lbs. of PCBs materials and capacitors accumulated which must be disposed of as soon as possible. 2) Construction of the containment floor in the PCBs storage building needs to be completed as soon as possible in order to bring City Light into compliance with the Toxic Substance Control Act. Further, that the shipment of the accumulated PCBs and the construction of the new floor must be coordinated so that we will not be forced to store PCBs elsewhere while the floor is being completed.

Len Metzger discussed the various ramifications of the insurance problem involved with the transport of PCBs. It was Len's opinion that, given the care and precautions which we employ when we do our own hauling, it is questionable that a high risk exists.

Pete Henault expressed his concern for the high cleanup costs involved (not to mention the cost of lawsuits from sports groups) should we have a collision accident over a stream or river. The group agreed that such an accident, should it occur, would be covered by the City's self insurance up to \$200,000 and the City's Vehicle Fleet Policy above \$200,000. It was concluded by the group that the risk of such an accident was minimal and that additional "Environmental" insurance may not be necessary.

Fred Mandapat stated that it is his intention to require several additional precautions if our personnel and equipment haul any more PCBs. Some of the added precautions would include: 1) Two drivers instead of only one. 2) Vehicle to be safety inspected and certified by MTD prior to each trip. 3) Each vehicle to carry clean up equipment and absorbant materials in case of minor spills. 4) Every 100 miles the driver shall stop and perform a visual and physical check of the vehicle and the load. 5) A complete log of each trip will be made and filed with the General Warehouse Supervisor at the South Service Center.

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In conclusion, Joe Recchi directed that:

- The existing load of PCBs be hauled to Wes-Con in Murphy, Idaho by City Light truck and crew as soon as possible following the precautions specified by Fred Mandapat.
- Walt Sickler be contacted by Fred Mandapat to see if construction of the containment floor in the PCBs building can be moved ahead on their priority list.
- The hauling of the existing PCBs load and the construction of the PCBs containment floor be coordinated to prevent PCBs from being stored elsewhere at the South Service Center.
- The Environmental Office and Materials Management research the Federal Regulations on the hauling of toxic substances to determine if any specific insurance coverages are specified, and if licensed disposal sites are specified.
- Del Young write a response letter to the City Purchasing Agent requesting that all bids be rejected due to non response to the insurance requirements by all bidders.
- O.E.A. research the Federal Register and contact E.P.A., Region X, for regulations on PCBs transportation and disposal.
- Materials Management, as lead agent, work with O.E.A. and City Purchasing to develop bid specifications for an authorized disposal firm for PCBs. The specification is to include pick-up of the PCBs materials and contaminated equipment F.O.B. South Service Center, transport by an I.C.C. carrier and disposal in an E.P.A. authorized disposal site.

Also, prepare an alternate specification for an I.C.C. carrier, with appropriate insurance, to transport under contract with the City, in lieu of the City transporting to an approved disposal site.

• Bid specifications to be completed by March 1, 1979.

DY:kc

cc: Vickery
Recchi
Henault/Riley
Mandapat/Young
Tuffs
File
Central File

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21104
Your
Seattle
City Light

Memorandum



DATE : January 5, 1979
TO : Gordon Vickery
FROM : W. R. Sickler *WR*
SUBJECT : Procedure for Identification, Cleanup and Disposal
of Polychlorinated Biphenyls (PCB)

The Lighting Department is now in compliance with the December 31, 1978, deadline of the Environmental Protection Agency's instructions as detailed in Volume 43, Number 34, of the Federal Register dated February 17, 1978, on the identification, labeling, recording and handling of all equipment containing PCB. This equipment has been identified by affixing the approved PCB label. Record cards have been made with the central file established in the Operation and Maintenance Division Office. Duplicate cards are on file at each headquarters for equipment under their jurisdiction. Warehouse personnel have labeled all capacitor stock, set up cards and movement control ledger. The PCB disposal storage area has been established. ~~The disposal storage area is now completed.~~ However, drawings for construction have been produced and the Job Order for fabrication has been issued. Work should be completed within a few weeks, weather permitting.

On Thursday, January 4, 1979, Mr. Neil Thompson of the Environmental Protection Agency inspected our PCB handling procedures and control methods. His comments were very favorable and he felt that City Light had done a good job in complying with the Federal Regulations. He offered a suggestion on a change in the disposal storage area if we were short on covered storage. He stated that capacitors that were not leaking could be stored in the open outside the containment area until being shipped to the disposal site. We have been keeping these units inside the storage shed.

We will continue to monitor our PCB handling program to stay within the regulation guidelines. All divisions are doing their best in cooperating and following our instructions and procedures.

(These procedures will be reviewed, revised as necessary, then set up as a standard Department policy)

RBE:mk

cc: Recchi
All Directors
Eaton
File